REMARKS

Claims 1-5, 7-9, 11-14, 16, 32-36, and 49 are currently pending in the subject application and are presently under consideration. Applicants' representative thanks the Examiner for courtesies extended during the telephonic interview with Deborah L. Corpus conducted on September 6, 2005 where the topic of a graph of objects for serialization/deserialization was discussed. Favorable reconsideration of the subject patent application is respectfully requested in view of the comments herein.

I. Rejection of Claims 1-5, 7-9, 11-14, 16, 32-36, and 49 Under 35 U.S.C. §102(e)

Claims 1-5, 7-9, 11-14, 16, 32-36, and 49 stand rejected under 35 U.S.C. §102(e) as being anticipated by Bahrs *et al.* (US 6,292,933). This rejection should be withdrawn for at least the following reason. Bahrs *et al.* does not describe each and every element of the subject claims.

> For a prior art reference to anticipate, 35 U.S.C. §102 requires that "***each and every element*** as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950 (Fed. Cir. 1999) (*quoting Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)) (emphasis added).

The invention as claimed relates to a system and method for facilitating employment of a pluggable formatter in a serialization and deserialization process. (*See* pg. 2, ll. 24-25). In particular, independent claims 1, 11, 32, and 49 recite a similar limitation: "a first data structure as ***a graph of objects for serialization.***" Bahrs *et al.* fails to describe such aspect of the invention as claimed.

The Examiner contends that Bahrs *et al.* describes a graph of objects for serialization with the PlacementListener at col. 16, line 18. (*See* Final Office Action dated August 9, 2005, pages 2, 5, and 6). The Examiner explains that PlacementListener places/contains the overall display of many graphical objects in a certain manner and must maintain such ordered grouping of individual graphical objects for serialization and

deserialization. (*See* Final Office Action dated August 9, 2005, pg. 6). Applicants' representative respectfully disagrees with such contention.

Bahrs *et al.* discloses the serialization and deserialization of data elements. The serializer receives a data element, replaces its class name string with a code having a smaller size than the class name string to form a modified data element, and serializes the modified data element. In deserialization, the deserializer restores the data element by replacing the indicator with the class name. (*See* Abstract). Although PlacementListener manages the placement of graphical objects on a display, a ***graph of objects*** is more than just an arranged display of objects. Bahrs *et al.* may discuss a group of objects, but a ***group*** of objects is not equivalent to a ***graph*** of objects. A ***graph*** of objects is a structure that contains a graph root, which is the top object in a graph (*See* pg. 9, line. 28), and subsequent objects that are referenced to other objects in the graph (*i.e.*, forward references and backward references) (*See* pg. 9, ll. 13-14), as illustrated in Figures 1-5. Bahrs *et al.*'s graphical objects bear no relation to one another beyond the physical positions they hold on the screen. The cited reference fails to describe a ***graph of objects*** as claimed in the invention.

In addition, the graph of objects in applicants' invention is retrieved ***for serialization.*** Bahrs *et al.*'s PlacementListener handles the placement of objects on a screen (*See* col. 16, line 26) for user/client viewing. The serialization and deserialization process in the cited reference refers to data elements (*See* col. 4, line 55), not a ***graph*** of data elements.

Furthermore, independent claim 34 recites "tracking forward references to other objects within the object" and independent claim 35 recites "repeating, retrieving, determining, instantiating, and populating for each object in an object graph." The Examiner contends that RequestEvent discloses such aspect. (*See* Final Office Action dated August 9, 2005, pg. 4). Applicants' representative respectfully disagrees with this contention. RequestEvent indicates that a service is required to process an event. (*See* col. 16, ll. 59-60). RequestEvent is silent with respect to object graphs, let alone forward references and processing of specific objects within object graphs.

In view of at least the foregoing, it is readily apparent that Bahrs *et al.* does not describe the invention as recited in independent claims 1, 11, 32, and 49 (and associated

dependent claims 2-5, 7-9, 12-14, 16, and 33-36). Accordingly, this rejection should be withdrawn.

CONCLUSION

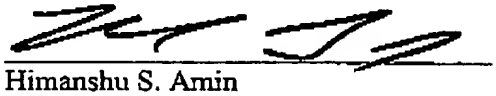
The present application is believed to be in condition for allowance in view of the above comments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [MSFTP256US].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

AMIN & TUROCY, LLP



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